

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709

VIRGINIA T. TOMOVA
Assistant United States Attorney
Nevada Bar Number 12504
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Virginia.Tomova@usdoj.gov

Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CRISTIANO AMPARO, an individual;
ABEL MILLARES-ROJAS; an individual,

Plaintiffs,

v.

LEROY ROLDAN, an individual;
RYDER TRUCK RENTAL LT.; a Florida
corporation; UNITED STATES OF
AMERICA *ex rel* UNITED STATES
POSTAL SERVICE; DOE I through X;
and ROE CORPORATIONS I through X,

Defendants.

Case No. 2:24-cv-00394-JAD-BNW

**Stipulation for Extension of Time to File
a Response to Plaintiffs' Amended
Complaint [ECF No. 21]**

(First Request)

Federal Defendants, the United States of America and LeRoy Roldan, and Plaintiffs, Cristiano Amparo and Abel Millares-Rojas, stipulate to extend the time from August 19, 2024, to September 3, 2024, for Federal Defendants to file a responsive pleading to Plaintiffs' amended complaint [ECF No. 21]. Undersigned defense counsel is on leave from August 15, 2024, to August 20, 2024, and Plaintiffs do not oppose an extension to accommodate that leave. Additionally, the agency is still completing its review of the amended complaint. For these reasons, the parties, through counsel, respectfully request Federal Defendants' time to respond to Plaintiffs' amended complaint be extended to **September 3, 2024**.

1 This is the first request to extend Federal Defendants' time to respond to Plaintiffs'
2 amended complaint [ECF No. 21]. This stipulated request is filed in good faith and not for
3 the purposes of undue delay.

4 Respectfully submitted this 19th day of August 2024.

5 THE BIG GUNS INJURY ATTORNEYS

JASON M. FRIERSON
United States Attorney

6 /s/ Benjamin Carman, Esq.

/s/ Virginia T. Tomova

7 BENJAMIN CARMAN, ESQ.

VIRGINIA T. TOMOVA

8 Nevada Bar No. 12565

Assistant United States Attorney

9 ADAM C. EDWARDS, ESQ.

Nevada Bar No. 15405

4045 Spencer Street Suite A52

Las Vegas, NV 89119

Attorneys for Plaintiffs

11 IT IS SO ORDERED:

12
13 

14 UNITED STATES MAGISTRATE JUDGE

15 DATED: August 20, 2024